

In the United States District
Courts for the Northern
District of Ohio

[pg # 1]

Josh Turner
plaintiff

vs

Alan Shaw Et. Al
Norfolk southern train company.
Defendants.

Case No 4:23-cv-0242-BYP

Judge B. Pearson

FILED

JUN 23 2023

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
YOUNGSTOWN

"Reply" To Defendants Motion to Dismiss.

- 1) on February 3rd 2023, Norfolk southern train company's train Derailed in the East Palestine Ohio Area. with life threatening Hazardous chemicals on Multiple train cars. on February 3rd 2023 Norfolk southern "CEO" and/or Employees orchestrated a "controlled" [Slow-up] or [Burn]!! into the ~~Public~~ public of the people of the United States of ~~America~~ America, these so called ["Chemicals"] Are life threatening, and Millions of Gallons of "Vinyl chloride" went into the ["Environment"] in and/or Around East Palestine Area...
- 2) on February 3rd 2023, while the Burn was going on the wind shifted towards the Area in which is [Hubbard] Mahoning county... thru the Day of February 3rd, 4th, 5th, 6th our prison is a super MAX security and we have no way to close or open windows it's a Automatic Fan Ventilation system for 3 days Every Inmate

[pg # 2]

In (OSP) - Ohio state penitentiary was Breathing in the ["Soot"] - Ash, vinyl chloride for 96 hours untill the Maintenance personal turned off our ventilation for 3 to 5 hours to clean the Ducts or vents out of the smell that was lingering in our cells for almost 4 Days. All the inmates started complaining About the Medical problems we wer having and still are having .. the Irritation of Burning skin, Rashes, cough, sinurs, chest congestions ...

- 3) on or Around March - April I put in A ["HSR"] wich is a Health Service Request Form to see a Medical staff personal .. I stated I had a Irritation on my left shoulder, a cough, Burning eyes, and chest congestions, Head Aches, Burning skin !! .. ~~The~~ The Medical staff stated, what e showed them on my left shoulder [A Red pea sized circle] was Due to the type of soap e was using .. so e changed my soap and lotion .. after a 2 week period of time nothing happened so I put in a rather "HSR" Health Service Request Form, stating it's not going away so the nurse / Medical staff Gave Me Antifungle cream said it was ["Ringworm"] after a few week nothing happened and I put in for a rather ["HSR"] the nurse / Medical staff said well lets try


[pg # 3]

Eucerin cream, It might be ceriosis, well after 2 more weeks nothing so the Medical supervisor [Ms. Morgan] Did a Skin sample and sent it off to an outside lab which came back [Skin Cancer] ~~1/1/11~~ Due to the so called Controlled Burn By Norfolk Southern train company "CEO" and/or Employees I have Received a Skin cancer Due to the soot/vignal chloride Being Burned into the AIR and leaked into our soil...

- 4) I am an Inmate at (OSP) and I'm not Allowed to Request my own Medical Records which I would on like for my Attorney to see them, if the Defendants want them for "Discovery" or trial purpose then I would have no problems with there Request... the courts will find in this time-line I have put forth my Medical Records will show All Factual Evidence on my Behalf is true and correct... I would just like to thank the courts to hearing my Reply to the Defendants Motion to Dismiss... Thank you for all your time.

Respectfully submitted;
 Josh Turner 798-557
 878 coitsville-Hubbard ^{et} youngstown Ohio 44505

I Declare under penalty and perjury
that the foregoing is true and
correct to the Best of my knowledge
Exacted on 6/19/2023

Signature  798-557
Name/print Josh Turner 798-557

Josh Turner 798-557
878 Coatesville - Hubbard ^{rel}
youngstown, ohio 44505

Case No. 4:23-cv-0242
Judge B. Pearson

Josha Turner #798-557

Ohio DEPARTMENT OF REHABILITATION
AND CORRECTION

OHIO STATE PENITENTIARY

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YOUNGSTOWN, OHIO 44505-4635

DRC 1608 (Rev 9/18)

CLEVELAND OH 44100

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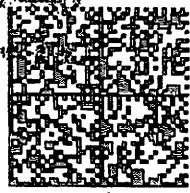
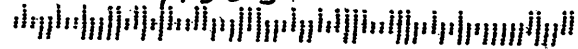
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